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Counsel for Defendant Marshawn Jones

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARSHAWN JONES,

Defendant.

No. CR-09-0970 MMC

STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING STATUS
DATE FROM MARCH 10, 2010 TO
MARCH 31, 2010 AND EXCLUDING
TIME UNDER 18 U.S.C. § 3161

The parties are scheduled to appear before this Court on March 10, 2010 at 2:30 p.m. for setting or change of plea. The parties requests that the matter be continued to March 31, 2010 (or the next date convenient to the Court) so that the defense can obtain documents (either from the government or independently) verifying the conviction to which defendant will stipulate in his plea agreement. The government is prepared to proceed on March 10, but understands the reason for the defense's request for the documents and thus agrees to the continuance.

The parties also agree that the time between March 10, 2010 and March 31, 2010 should be excluded under the Speedy Trial Act. The continuance is necessary for effective preparation of

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1 counsel, 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv), and the ends of justice served by granting
2 such a continuance outweigh the best interests of the public and the defendant in a speedy trial. 18
3 U.S.C. § 3161(h)(7)(A).

4 SO STIPULATED:

5 JOSEPH P. RUSSONIELLO
6 United States Attorney

7
8 DATED: March 9, 2010

9
10 /s/
11 MATTHEW L. MCCARTHY
12 Assistant United States Attorney

13
14 DATED: March 9, 2010

15 /s/
16 SHAWN HALBERT
17 Assistant Federal Public Defender

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19 For the reasons stated above, the Court finds that the continuance of time for the next hearing
20 before this court from March 10, 2010 to March 31, 2010 is warranted because the failure to grant
21 the requested continuance would deny the defense effective preparation of counsel; thus, the ends of
22 justice served by the continuance outweigh the best interests of the public and the defendant in a
23 speedy trial. 18 U.S.C. § 3161 (h)(7)(A), (h)(7)(B)(iv).

24
25 SO ORDERED.

26 DATED: March 9, 2010


THE HONORABLE MAXINE M. CHESNEY
United States District Court